

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
DORCA AMANCIO : CHAPTER 13
Debtor : CASE NO. 5-23-02074

OBJECTION TO CERTIFICATION OF DEFAULT

NOW COMES, Dorca Amancio, the above Debtor, by and through his counsel, Tullio DeLuca, Esq., and files this Objection to Certification of Default and states the following:

1. On December 06, 2024, a Motion to Dismiss due to material default was filed.
2. On April 15, 2025, Jack N. Zaharopoulos, Esq. filed a Certificate of Default stating that the Debtor has failed to cure the arrears.
3. Debtor's Counsel is in the process of contacting the Debtor to ascertain if the payments have been made and/or if Debtor is in possession of funds needed to cure the arrears.
4. The Debtor requests that a hearing be scheduled on the Objection to the Certificate of Default.

WHEREFORE, the Debtor respectfully requests that this Honorable Court sustain the Objection to the Certification of Default and deny the dismissal of the Chapter 13 Case.

Respectfully submitted,

Date: April 17, 2025

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID #59887
Counsel for Debtor
381 N. 9th Avenue
Scranton, Pa 18504

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 17, 2025, he caused a true and correct copy of Debtor's Objection to Certification of Default to be served Via electronic filing on the following CM/ECF participants:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

Date of Mailing: April 17, 2025

/s/Tullio DeLuca
Tullio DeLuca, Esquire